

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LLOYD’S OF LONDON SYNDICATE
2987,

Plaintiff,

v.

PCL HOMES, LLC, a Washington Limited
Liability Company, and ESTATE OF JOSE
TRINIDAD MEDRANO-VILLAGRAN, by
and through its Administrator, NOVEMA
APRIL MEDRANO;

Defendants.

No. 2:23-cv-1497

**PLAINTIFF’S SUBMISSION IN
RESPONSE TO ORDER TO SHOW
CAUSE (DKT. 12) AND NOTICE OF
VOLUNTARY DISMISSAL WITHOUT
PREJUDICE AND WITHOUT COSTS
PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(i)**

INTRODUCTION AND RELIEF REQUESTED

Plaintiff Lloyd’s of London Syndicate 2987 submits this response to the Court’s Order to Show Cause of November 8, 2023. Dkt. 12. This Court observed in its Order that Defendant PCL Homes, LLC’s amended corporate disclosure statement confirmed that the limited liability company has a member, Remix Investments, Inc., that is a Washington corporation but maintains its principal place of business in Canada. The Court’s order also noted that because Plaintiff is a citizen of England and a member of Defendant PCL Homes, LLC is a citizen of Canada, the case falls outside the scope of federal subject matter jurisdiction under 28 U.S.C. § 1332. Dkt. 12 at 2.

PLAINTIFF’S SUBMISSION IN RESPONSE TO ORDER TO SHOW CAUSE (DKT. 12) AND NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AND WIHTOUT COSTS PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i) - 1

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1 Plaintiff acknowledges the Court's concerns as to subject matter jurisdiction. Pursuant to
2 Fed.R.Civ.P. 41(a)(1)(A)(i), Plaintiff submits this voluntary notice of dismissal of its claims in this
3 action without prejudice and without an Order of the Court. Plaintiff has not previously dismissed any
4 federal or state court action based on or including the same claims at issue. Plaintiff's notice of
5 dismissal is without fees or costs to any party.
6

7 Plaintiff initiated this action on September 26, 2023. As of the date of this submission, none of
8 the Defendants have filed an answer or a motion for summary judgment.
9

10 DATED this 15th day of November, 2023.

11 MURPHY ARMSTRONG & FELTON LLP

12 By: /s/ James P. Murphy
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16 *Attorneys for Plaintiff*
17 *Lloyd's London Syndicate 2987*
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CERTIFICATE OF SERVICE

I hereby certify and declare that on November 15, 2023, I electronically filed the foregoing:

1. PLAINTIFF'S SUBMISSION IN RESPONSE TO ORDER TO SHOW CAUSE (DKT.12) AND NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AND WITHOUT COSTS PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i).

with the Clerk of the Court through the CM/ECF system, which will send notification to the following counsel:

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Attorneys for PCL Homes, LLC

I also certify and declare that on November 15, 2023, I sent a copy of this document via US mail and via electronic mail to the following counsel:

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*Attorneys for Estate of Jose
Trinidad Medrano-Villagran*

DATED at Seattle, Washington, this 15th day of November, 2023.

By: /s/ Angelina Hernandez
Angelina Hernandez, Paralegal